

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION**

**RITA and PAM JERNIGAN; BECCA and
TARA AUSTIN; and RANDY and GARY
EDDY-MCCAIN**

PLAINTIFFS

v.

NO. 4:13-CV-410 KGB

**LARRY CRANE, In His Official Capacity As
Circuit And County Clerk For Pulaski
County, Arkansas; GOVERNOR MIKE
BEEBE, In His Official Capacity As
Governor And Chief Executive Officer For
The State Of Arkansas; and DUSTIN
MCDANIEL, In His Official Capacity As
Attorney General For The State Of Arkansas**

DEFENDANTS

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFFS' COMPLAINT PENDING A RULING ON
PLAINTIFFS' MOTION TO AMEND COMPLAINT**

COMES Separate Defendant, Arkansas Attorney General Dustin McDaniel, by and through his Counsel, and for his Unopposed Motion for Extension of Time to Respond to Plaintiffs' Complaint Pending A Ruling on Plaintiffs' Motion To Amend Complaint, states:

1. Separate Defendant's response to Plaintiffs' Complaint in the instant suit is due on or before January 6, 3014.
2. This morning, Undersigned Counsel was informed that Plaintiffs will be filing a Motion to Amend Complaint and that the proposed amended Complaint will be filed in less than 2 weeks.
3. In order to avoid spending resources briefing issues which may soon be mooted by the filing of an amended Complaint, Defendant seeks an extension of time to respond to the current Complaint, pending a ruling on Plaintiffs' Motion to Amend Complaint. Should said

Motion to Amend be denied, then Defendants' response to the original Complaint shall be due within ten (10) days of the date of the Order denying said Motion to Amend.

4. Pursuant to Local Rule 6.2, Undersigned has conferred with opposing counsel regarding the foregoing and they have no objection to Defendant's proposed extension of time, as stated herein.

5. None of the parties would be prejudiced by the granting of such an extension and the foregoing Motion is not being made for the purpose of undue delay.

WHEREFORE, Separate Defendant respectfully requests that this Court grant the foregoing Motion and all other just and proper relief to which he may be entitled.

Respectfully submitted,

ATTORNEY GENERAL DUSTIN
MCDANIEL, Separate Defendant

By: /s/ Nga Mahfouz
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CERTIFICATE OF SERVICE

I, Nga Mahfouz, Assistant Attorney General, do hereby certify that on January 6, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

/s/ Nga Mahfouz
Nga Mahfouz AR Bar No. 96149